

May 9th, 1999

Bruce Campbell
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Los Angeles, CA 90049

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

0651 '99 MAY 13 A9:26

Re: Docket # 98N-1038 (Irradiation in the Production, Processing, & Handling of Food)

To FDA Dockets Mngmt Branch:

I hereby call for the strengthening (with no expiration date) of labeling requirements related to irradiated whole foods and irradiated ingredients in food (including spices).

There also needs to be enforcement and fines (plus jail for flagrant deceivers) for failing to label irradiated food and for inaccurate claims.

While the radura with a happy sunny sunflower-type sort of face would not be my preferred symbol, since some people are familiar with it, it (or another symbol) should be required on packages of irradiated food or on food with irradiated ingredients.

I vehemently object to the plan to possibly change "treated with irradiation" or "treated by ionizing radiation" to "treated by pasteurization" or "pasteurized". Such a change would be a blatant deception since these processes are quite different. If there is a change in the written label, I would accept a change to "treated with radioactive waste".

If a whole food (for instance in the produce section) is irradiated, it must say so in words and symbol within a few feet of where the item is. It is appalling that the current milk toast law does not require labeling if an item is not 100% irradiated. I understand that if an irradiated potato is put into a can and a few drops of water or a pinch of salt are added, that it does not have to be labeled despite 99% of what's in the can having been irradiated.

Size matters! In regards to the size of the radura symbol and written label noting that the food or ingredient is irradiated, the radura should be as large as the brand name if it is considerably smaller than the name of the item. If the brand name is considerably larger than the name of the product, for instance I am looking at a Welch's Grape Juice container with Welch's considerably larger than grape juice, the radura should be at least 3/4 of the size of "grape juice."

If the company name is small like I notice with Nabisco, the written label "treated with irradiation" or "treated by ionizing radiation" should be at least 3/4 of the size of the Nabisco. The written irradiation label should be at least 150% to 200% of the size of the ingredients.

Lastly, I urge that the comments which the FDA receives about irradiation labeling be posted on the Internet. Thank you very much.

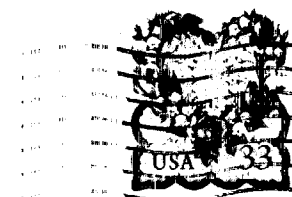
Sincerely,

Bruce Campbell
Bruce Campbell

98N-1038

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